

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division

Clovies Johnson,

*Debtor.*

Chapter 13

Case No. 24-12212-DJB


**Motion to Modify Plan After Confirmation**

Debtor Clovies Johnson, through his attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on June 27, 2024.
2. The plan was confirmed on December 12, 2024.
3. The plan was a 100% plan in order to conform with the Debtor's CMI on Form 122C-2, which was calculated as being \$613.30.
4. The CMI was based on the erroneous inclusion of the Debtor's estimated pro-rated federal tax refund across the 6-month look-back period of Form 122C-1.
5. A creditor who the Debtor was surrendering property to in the original confirmed plan has recently amended their secured claim to an unsecured deficiency claim, rendering the confirmed plan effectively pro-rata.
6. The Debtor has amended his Form 122C-1, and Form 122C-2, to reflect the correct CMI of \$189.47.
7. The amount being distributed towards general unsecured creditors in the confirmed plan already conforms to the corrected CMI.
8. The proposed plan changes the plan from a 100% plan to pro-rata, but leaves all dollar amounts unchanged, so no Supplement to Schedule J is necessary.
9. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 40 as the new confirmed plan.

Date: June 4, 2025

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